

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SONTERRA CAPITAL MASTER FUND, LTD., HAYMAN
CAPITAL MASTER FUND, L.P., JAPAN MACRO
OPPORTUNITIES MASTER FUND, L.P., and CALIFORNIA
STATE TEACHERS' RETIREMENT SYSTEM on behalf of
themselves and all others similarly situated,

Plaintiffs,

- against -

UBS AG, UBS SECURITIES JAPAN CO. LTD., MIZUHO
BANK, LTD., THE BANK OF TOKYO-MITSUBISHI UFJ,
LTD., THE SUMITOMO TRUST AND BANKING CO.,
LTD., THE NORINCHUKIN BANK, MITSUBISHI UFJ
TRUST AND BANKING CORPORATION, SUMITOMO
MITSUI BANKING CORPORATION, RESONA BANK,
LTD., J.P. MORGAN CHASE & CO., JPMORGAN CHASE
BANK, NATIONAL ASSOCIATION, J.P. MORGAN
SECURITIES PLC, MIZUHO CORPORATE BANK, LTD.,
DEUTSCHE BANK AG, DB GROUP SERVICES UK
LIMITED, MIZUHO TRUST AND BANKING CO., LTD.,
THE SHOKO CHUKIN BANK, LTD., SHINKIN CENTRAL
BANK, THE BANK OF YOKOHAMA, LTD., SOCIÉTÉ
GÉNÉRALE SA, THE ROYAL BANK OF SCOTLAND
GROUP PLC, THE ROYAL BANK OF SCOTLAND PLC,
RBS SECURITIES JAPAN LIMITED, RBS SECURITIES
INC., BARCLAYS BANK PLC, BARCLAYS PLC, BARCLAYS
CAPITAL INC., CITIBANK, NA, CITIGROUP, INC.,
CITIBANK, JAPAN LTD., CITIGROUP GLOBAL
MARKETS JAPAN, INC., COÖPERATIEVE CENTRALE
RAIFFEISEN-BOERENLEENBANK B.A., HSBC
HOLDINGS PLC, HSBC BANK PLC, LLOYDS BANKING
GROUP PLC, LLOYDS BANK PLC, ICAP PLC, ICAP
EUROPE LIMITED, R.P. MARTIN HOLDINGS LIMITED,
MARTIN BROKERS (UK) LTD., TULLETT PREBON PLC,
BANK OF AMERICA CORPORATION, BANK OF
AMERICA, N.A., MERRILL LYNCH INTERNATIONAL,
AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 15-cv-5844 (GBD)
(HBP)

**PLAINTIFFS' NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT WITH DEFENDANTS HSBC HOLDINGS PLC AND HSBC
BANK PLC**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the Declaration of Vincent Briganti and the exhibits attached thereto including the Settlement Agreement, the Declaration of Geoffrey M. Horn and the exhibits attached thereto, and the record herein, Plaintiffs, by and through their undersigned counsel, will respectfully move this Court, before the Honorable George B. Daniels, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on a date and time to be set by the Court, for an order granting Plaintiffs' motion for preliminary approval of the Settlement Agreement between Plaintiffs and HSBC Holdings plc and HSBC Bank plc, and their subsidiaries and affiliates (collectively "HSBC") and the other relief set forth in the proposed superseding order annexed hereto.

Dated: June 17, 2016
White Plains, New York

**LOWEY DANNENBERG COHEN & HART,
P.C.**

/s/ Vincent Briganti
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